

INTERVENTION



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IO DATA CENTERS, LLC
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AZ CORP COMMISSION
DOCKET CONTROL

ORIGINAL

Attorney for IO Data Centers, LLC

COMMISSIONERS

BOB STUMP, Chairman
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BRENDA BURNS
ROBERT L. BURNS
SUSAN BITTER SMITH

Arizona Corporation Commission

DOCKETED

JAN 14 2014

DOCKETED BY

BEFORE THE ARIZONA CORPORATION COMMISSION

**IN THE MATTER OF THE
COMMISSION'S INQUIRY INTO
POTENTIAL IMPACTS TO THE
CURRENT UTILITY MODEL
RESULTING FROM INNOVATION AND
TECHNOLOGICAL DEVELOPMENTS
IN GENERATION AND DELIVERY OF
ENERGY**

DOCKET NO.: E-00000J-13-0375

**IO DATA CENTERS, LLC
MOTION TO INTERVENE AND
REQUEST TO BE ADDED TO SERVICE
LIST**

Pursuant to A.A.C. R14-3-105 IO Data Centers, LLC ("IO"), on behalf of its indirect subsidiaries IO Phoenix One, LLC and IO Capital Princess, LLC, hereby moves to intervene in the above-captioned case.

I. INTEREST IN PROCEEDING

1. IO, a company founded and headquartered in Arizona, is a global leader in software-defined data centers and pioneered the next generation of data center infrastructure technology. IO began by providing traditional hosted data center services in our Scottsdale, Arizona location in 2007, and we opened a second site in Phoenix, Arizona in

1 2009. In 2013 we opened our new factory in Chandler, Arizona from which we
2 manufacture all our products and has support our growth into Edison, New Jersey,
3 Springboro, Ohio and Singapore, in addition to customers wherever they may be located
4 around the globe.
5

- 6 2. IO is compulsory customer of Arizona Public Service ("APS"), under APS's Extra Large
7 General Service E-35 Rate Schedule.
8
9 3. IO is directly and substantially affected by the issues to be address in this proceeding.
10
11 4. IO reserves the right to take any position on any issues in this case.
12
13 5. No other party can adequately represent IO's interests.

14 **II. SERVICE**

15 IO requests to be added to the service list in the above-captioned docket. All notices and
16 communication should be sent to the following:

17 Anthony L. Wanger
18 President
19 IO Data Centers, LLC
20 615 N. 48th Street
21 Phoenix, Arizona 85008
22 t@io.com

23 Alan L. Kierman
24 Director of Real Estate & Special Counsel
25 IO Data Centers, LLC
26 615 N. 48th Street
27 Phoenix, Arizona 85008
28 akierman@io.com

III. REQUESTED RELIEF

For the reasons set forth herein, IO requests that it be permitted to intervene and appear in
this matter.

1 RESPECTFULLY SUBMITTED this 13th of January, 2014.

2 

3
4 Alan L. Kierman
Attorney for IO Data Centers, LLC

PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 13th day of January, 2014, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

By: 

Copies of the foregoing mailed
this 13th day of January, 2014 to:

James Hamilton
822 N. 5th Ave
Phoenix, Arizona 85003

Sidney Smith
HoHoKam Irrigation & Drainage District
142 South Arizona Boulevard
Coolidge, Arizona 85128

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1 Steve Olea
2 1200 W. Washington St.
3 Phoenix, Arizona 85007
4

Sulphur Springs Valley Electric
Cooperative, Inc.
Jack Blair
311 E. Wilcox
Sierra Vista, Arizona 85635

5 Arizona Corporation Commission
6 Lyn Farmer
7 1200 W. Washington
8 Phoenix, Arizona 85007-2927
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PO Box 1448
Tubac, Arizona 85646

10 Michael Curtis
11 501 East Thomas Road
12 Phoenix, Arizona 85012-3205
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88 E. Broadway Blvd. MS HQE910
P.O. Box 711
Tucson, Arizona 85702

14 Dillon Holmes
15 Clean Power Arizona
16 9635 N 7th St. #47520
17 Phoenix, Arizona 85068
18

Heather McNelly
1878 W. White Mountain Blvd
Lakeside, Arizona 85929

19 Arizona Public Service Company
20 Leland Snook
21 P.O. Box 53999, Mail Station 9708
22 Phoenix, Arizona 85072
23

Mohave Electric Cooperative, Inc.
Peggy Gillman
P.O. Box 1045
Bullhead City, Arizona 86430

24 Thomas Loquvam
25 P.O. Box 53999, MS 8695
26 Phoenix, Arizona 85072
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Greg Bass
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